

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA; and  
RASIER, LLC

Plaintiffs,

v.

CITY OF SEATTLE; SEATTLE  
DEPARTMENT OF FINANCE AND  
ADMINISTRATIVE SERVICES; and FRED  
PODESTA, in his official capacity as Director,  
Finance and Administrative Services, City of  
Seattle,

Defendants.

No. 17-cv-00370-RSL

**JOINT MOTION FOR  
EXTENSION OF TIME TO FILE  
NOTICE REGARDING  
POSSESSION, CUSTODY, OR  
CONTROL OF DOCUMENTS**

**NOTED ON MOTION  
CALENDAR:  
MARCH 20, 2020**

In a joint submission regarding discovery, Defendant City of Seattle sought an order from this Court compelling Plaintiff Chamber of Commerce to produce documents belonging to its members, including Lyft, Inc., and Eastside for Hire. (Dkt. 113.) The Chamber responded that it has no obligation to do so because it lacks possession, custody, or control of its members' documents. In a March 10 ruling, this Court ordered the Chamber to "notify the Court whether it has the power to obtain and produce the documents requested by the City of Seattle in its First Set of Requests for Production," given the Chamber's "relationship with its members and whatever authorization gives it the right to pursue this litigation." (Dkt. 116 at 4-5.)

The Chamber, Rasier, LLC, and the City of Seattle hereby jointly move for a 14-day extension of time for the Chamber to file the discovery notice ordered in this Court's March 10 ruling. (Dkt. 116). The notice is currently due Tuesday, March 24, 2010. The parties request an extension to and including April 7, 2020. The additional time will maintain the current status quo while the parties discuss how the litigation should proceed going forward. The parties also request additional time due to the law-office closures and court closures required by the COVID-19 pandemic. For these reasons, good cause exists for a 14-day extension of time.

DATED this 20th day of March, 2020.

Respectfully submitted,

By: s/ Robert J. Maguire  
 Robert J. Maguire, WSBA 29909  
 Douglas C. Ross, WSBA 12811  
 DAVIS WRIGHT TREMAINE  
 Suite 3300  
 920 Fifth Avenue  
 Seattle, WA 98104-1610  
 (206) 622-3150  
 (206) 757-7700 FAX  
 robmaguire@dwt.com

*Attorneys for Plaintiff Rasier, LLC*

By: s/ P. Casey Pitts (via email auth.)  
 Stephen P. Berzon (pro hac vice)  
 Stacey M. Leyton (pro hac vice)  
 P. Casey Pitts (pro hac vice)  
 ALTSHULER BERZON LLP  
 177 Post Street, Suite 300  
 San Francisco, CA 94108  
 (415) 421-7151

By: s/ Timothy J. O'Connell (via email auth)  
 Timothy J. O'Connell, WSBA 15372  
 STOEL RIVES LLP  
 600 University Street, Suite 3600  
 Seattle, WA 98101  
 (206) 624-0900  
 (206) 386-7500 FAX  
 Tim.oconnell@stoel.com

Michael A. Carvin  
 (D.C. Bar No. 366784)  
 (pro hac vice)

Christian G. Vergonis  
 (D.C. Bar No. 483293)  
 (pro hac vice)

Jacqueline M. Holmes  
 (D.C. Bar No. 450357)  
 (pro hac vice)

Robert Stander  
 (D.C. Bar No. 1028454)  
 (pro hac vice)

JONES DAY  
 51 Louisiana Avenue, N.W.  
 Washington, D.C. 20001  
 (202) 879-3939  
 (202) 616-1700 FAX  
 mcarvin@jonesday.com

1 PETER S. HOLMES

2 *Seattle City Attorney*

3 JESSICA NADELMAN

4 SARA O'CONNOR-KRISS

5 *Assistant City Attorneys*

6 *Seattle City Attorney's Office*

7 701 Fifth Avenue, Suite 2050

8 Seattle, WA 98104

9 (206) 684-8200

10 *Attorneys for Defendants*

11 *City of Seattle et al*

Steven P. Lehotsky (pro hac vice)

(D.C. Bar No. 992725)

U.S. CHAMBER LITIGATION CENTER

1615 H Street, N.W.

Washington, D.C. 20062

(202) 463-3187

slehotsky@uschamber.com

*Attorneys for Plaintiff*

*Chamber of Commerce of the*

*United States of America*